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6. Between November 21, 2003 and December 3, 2003, Peoples Gas' attorney Brian McCarthy withdrew as counsel and attorney Blair Hanzlik replaced him as counsel to Peoples Gas.

8. Complainant has not answered Peoples Gas' outstanding discovery requests.

9. Pursuant to 83 Ill. Adm. Code 200.80, *Computation of Time*, and 83 Ill. Adm. Code 200.150(c), *Service*, Complainant's response was due on December 18, 2003.

10. On December 19, 2003 Counsel for Peoples Gas sent, by U.S. Mail, another request that Complainant answer the "First Request for Information" propounded to it by Peoples Gas. A copy of that letter is attached hereto as Exhibit B.

11. On January 6, 2004 Peoples Gas' counsel telephoned Ms. Triplett requesting that Complainant answer "Respondent's First Request for Information".

12. Ms. Triplett stated that the responses would be ready by January 8, 2004.

13. On January 8, 2004 Ms. Triplett did not have the responses and asked for an additional week.

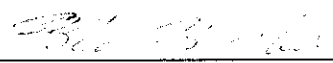
14. On January 14, 2004 Counsel for Peoples Gas called Ms. Triplett and left a message requesting production of the materials.

15. Ms. Triplett did not return the call.

16. To date, one month after discovery responses were due, Peoples Gas has received no response to "Respondent's First Request for Information" or its letter.

WHEREFORE, Respondent respectfully requests that the Judge to issue a ruling compelling Complainant to promptly answer "Respondent's First Set of Data Requests to Complainant."

Respectfully submitted,

By  _____

Blair B. Hanzlik
An Attorney for
The Peoples Gas Light and Coke Company

Blair B. Hanzlik
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77 W. Wacker Dr.
Suite 4400
Chicago, IL 60601
Phone: (312) 641.2068

Dated this 15th day of
January, 2004, at Chicago, Illinois

STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

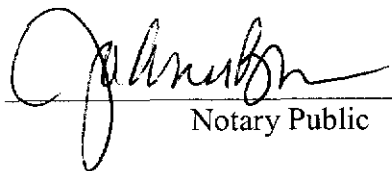
VERIFICATION

I, Blair B. Hanzlik, being first duly sworn upon oath, depose and say that I have read the above and foregoing Respondent's Motion To Compel Discovery by me subscribed and know the contents thereof; and that said contents are true in substance and in fact.

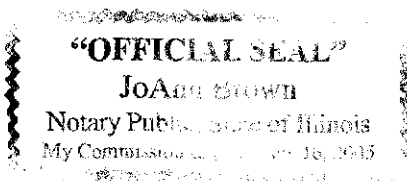
By _____

Blair B. Hanzlik
An Attorney for
The Peoples Gas Light and Coke Company

SUBSCRIBED and SWORN to before
me this 15th day of January 2004



Notary Public



CERTIFICATE OF SERVICE

I hereby certify that I have this day served this Respondent's Motion to Compel Discovery by personal delivery or by causing a copy thereof to be placed in the United States mail with first class postage affixed, addressed to the Complainant and the Administrative Law Judge in Docket No. 03-0520. Dated at Chicago, Illinois this 15th day of January, 2004.

Respectfully submitted,

By Blair B. Hanzlik

Blair B. Hanzlik
An Attorney for
The Peoples Gas Light and Coke Company